

**BILLY J. WILLIAMS, OSB #901366**

United States Attorney

District of Oregon

**KATHLEEN L. BICKERS, OSB #85151**

Assistant United States Attorney

1000 S.W. Third Avenue, Suite 600

Portland, Oregon 97204

Telephone: (503) 727-1100

Facsimile Telephone: (503) 727-1117

Internet E-mail Address: kathleen.bickers@usdoj.gov

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF OREGON**

**EUGENE DIVISION**

**UNITED STATES OF AMERICA,**

Civil No. 6:17-cv-01885

**Plaintiff,**

**COMPLAINT**

Claim for Debt

v.

**SHELLEY VON FLATERN,**

**Defendant.**

Plaintiff, United States of America, acting herein by the United States Attorney for the District of Oregon, complains and alleges:

1. That this action is brought by the United States of America, with jurisdiction provided by 28 U.S.C. Section 1345.

2. That the defendant, Shelley Von Flatern, is a resident of the State of Oregon within the Court's jurisdiction.

3. That the defendant is indebted to the plaintiff in the principal amount of \$79,278.18, plus interest on this principal computed at the rate of 4.375 percent per annum in the amount of \$19,328.06 as of August 4, 2017, and interest continuing thereafter on this principal at the rate of 4.375 percent annum, until the date of judgment. See Exhibits A and B attached hereto and incorporated herein.

4. Demand has been made upon the defendant by the plaintiff for the sum due but the amount due remains unpaid.

Wherefore, the plaintiff prays judgment against the defendant for the total of \$98,606.24, inclusive of interest of \$19,328.06 at 4.375 percent per annum on the principal of \$79,278.18, which has accrued as of August 4, 2017, and will continue to accrue until date of judgment. Plaintiff further demands, pursuant to 28 U.S.C., Section 1961, that interest on the judgment be at the legal rate until paid in full.

Dated this 22<sup>nd</sup> day of November, 2017.

BILLY J. WILLIAMS  
United States Attorney  
District of Oregon



KATHLEEN L. BICKERS  
Assistant United States Attorney